

## REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed September 29, 2008. Upon entry of the amendments in this response, claims 41 – 78 remain pending. In particular, Applicants amend claims 46, 52, 57, 68, 71, and 74. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

### I. Rejections Under 35 U.S.C. §103(a) – Microsoft, Brownwell, and Moroz

#### A. Claim 41 is Allowable Over Microsoft further in view of Brownell and Moroz

The Office Action indicates that claim 41 stands rejected under 35 U.S.C. §103(a) as being unpatentable over "USB Remote NDIS Devices and Windows" ("Microsoft") further in view of "USB Host to Host Links" ("Brownell") and U.S. Patent Publication Number 2001/0042150 ("Moroz"). Applicants respectfully traverse this rejection for at least the reason that *Microsoft* further in view of *Brownell* and *Moroz* fails to disclose, teach, or suggest all of the elements of claim 41. More specifically, claim 41 recites:

A method for coupling a universal serial bus network adapter supporting both a remote network drive interface specification and a non-network drive interface specification, the method performed by a network adapter, the method, comprising:  
    providing a plurality of universal serial bus configurations to a universal serial bus network;  
    receiving a first request from a host, the host coupled to a device;  
    returning a remote network drive interface specification configuration from the network adapter;  
    receiving a second request from the host, *in response to receiving an indication of multiple support configurations*;  
    returning a non-remote network drive interface specification configuration, where the host is configured to parse the received configuration to determine the configuration supported by the device and where the host is configured to select a configuration that matches a client driver.

*(Emphasis added).*

Applicants respectfully submit that claim 41 is allowable over the cited art for at least the reason that none of the cited references, taken alone or in combination, discloses, teaches, or

suggests a "method for coupling a universal serial bus network adapter supporting both a remote network drive interface specification and a non-network drive interface specification, the method performed by a network adapter, the method, comprising... receiving a second request from the host, ***in response to receiving an indication of multiple support configurations***" as recited in claim 41. More specifically, the Office Action states "Microsoft does not disclose, but Moroz et al. disclose... receiving a second request from the host, in response to receiving an indication of support configurations (Moroz et al. – Page 4, ¶ [0045] recites the system requesting configuration information from a first I/O port, and if it detects more than one I/O port exists, will continue with requests until all configuration information is retrieved)" (OA page 4, second to last paragraph). As illustrated in this passage, *Moroz discloses in response to detecting that more than one I/O port exists, the system will request configuration information.* This is different than claim 41 for at least the reason that "support configurations" from claim 41 and supported by the specification are different than "I/O ports" of *Moroz*. Further, *Brownwell* fails to overcome the deficiencies of *Microsoft* and *Moroz*. For at least this reason, claim 41 is allowable.

**B. Claim 52 is Allowable Over Microsoft further in view of Brownell and Moroz**

The Office Action indicates that claim 52 stands rejected under 35 U.S.C. §103(a) as being unpatentable over "USB Remote NDIS Devices and Windows" ("Microsoft") further in view of "USB Host to Host Links" ("Brownell") and U.S. Patent Publication Number 2001/0042150 ("Moroz"). Applicants respectfully traverse this rejection for at least the reason that *Microsoft* further in view of *Brownell* and *Moroz* fails to disclose, teach, or suggest all of the elements of claim 52. More specifically, claim 52 recites:

An apparatus for coupling universal serial bus devices network adapter supporting both remote network drive interface specification and non-network drive interface specification, comprising:

a universal serial bus network configured to receive a plurality of universal serial bus configurations;

a receiving component configured to receive a first request from a network adapter;

a network adapter for returning a remote network drive interface specification configuration, the network adapter receiving a second request from a host, *when there is an indication of multiple support configurations*;

a parsing component for parsing all the received configuration to determine the configuration supported by the device; and

wherein the host selects the configuration that matches a client driver.

**(Emphasis added).**

Applicants respectfully submit that claim 52 is allowable over the cited art for at least the reason that none of the cited references, taken alone or in combination, discloses, teaches, or suggests an "apparatus for coupling universal serial bus devices network adapter supporting both remote network drive interface specification and non-network drive interface specification, comprising... a network adapter for returning a remote network drive interface specification configuration, the network adapter receiving a second request from a host, *when there is an indication of multiple support configurations*" as recited in claim 52. More specifically, the Office Action states "Microsoft does not disclose, but Moroz et al. disclose... receiving a second request from the host, in response to receiving an indication of support configurations (Moroz et al. – Page 4, ¶ [0045] recites the system requesting configuration information from a first I/O port, and if it detects more than one I/O port exists, will continue with requests until all configuration information is retrieved)" (OA page 4, second to last paragraph). As illustrated in this passage, Moroz discloses in response to detecting that more than one I/O port exists, the system will request configuration information. This is different than claim 52 for at least the reason that "support configurations" from claim 52 and supported by the specification are

different than "I/O ports" of *Moroz*. Further, *Brownell* fails to overcome the deficiencies of *Microsoft* and *Moroz*. For at least this reason, claim 52 is allowable.

**C. Claim 63 is Allowable Over Microsoft further in view of Brownell and Moroz**

The Office Action indicates that claim 63 stands rejected under 35 U.S.C. §103(a) as being unpatentable over "USB Remote NDIS Devices and Windows" ("Microsoft") further in view of "USB Host to Host Links" ("Brownell") and U.S. Patent Publication Number 2001/0042150 ("Moroz"). Applicants respectfully traverse this rejection for at least the reason that *Microsoft* further in view of *Brownell* and *Moroz* fails to disclose, teach, or suggest all of the elements of claim 63. More specifically, claim 63 recites:

A system for attaching a universal serial bus network adapter supporting both remote network drive interface specification and non-network drive interface specification, comprising:

- a providing component configured to provide two universal serial bus configurations to a universal serial bus network;
- a first receiving component configured to receive a first request from a host;
- a first returning component configured to return a remote network drive interface specification configuration from the network adapter;
- a second receiving component configured to receive a second request from a host, *when there is an indication of multiple support configurations*;
- a second returning component configured to return a non-remote network drive interface specification configuration from the network adapter;
- a parsing component configured to parse all the received configuration to determine the configuration supported by the device; and
- a selecting component configured to select a configuration that matches a client driver.

*(Emphasis added).*

Applicants respectfully submit that claim 63 is allowable over the cited art for at least the reason that none of the cited references, taken alone or in combination, discloses, teaches, or suggests a "system for attaching a universal serial bus network adapter supporting both remote network drive interface specification and non-network drive interface specification, comprising..."

a second receiving component configured to receive a second request from a host, *when there is an indication of multiple support configurations*" as recited in claim 63. More specifically, the Office Action states "Microsoft does not disclose, but Moroz et al. disclose... receiving a second request from the host, in response to receiving an indication of support configurations (Moroz et al. – Page 4, ¶ [0045] recites the system requesting configuration information from a first I/O port, and if it detects more than one I/O port exists, will continue with requests until all configuration information is retrieved)" (OA page 4, second to last paragraph). As illustrated in this passage, *Moroz discloses in response to detecting that more than one I/O port exists*, the system will request configuration information. This is different than claim 63 for at least the reason that "support configurations" from claim 63 and supported by the specification are different than "I/O ports" of *Moroz*. Further, *Brownell* fails to overcome the deficiencies of *Microsoft* and *Moroz*. For at least this reason, claim 63 is allowable.

**D. Claims 42 – 45, 53 – 56, and 64 – 67 are Allowable Over Microsoft further in view of Brownell and Moroz**

The Office Action indicates that claims 42 – 45, 53 – 56, and 64 – 67 stand rejected under 35 U.S.C. §103(a) as being unpatentable over "USB Remote NDIS Devices and Windows" ("Microsoft") further in view of "USB Host to Host Links" ("Brownell") and U.S. Patent Publication Number 2001/0042150 ("Moroz"). Applicants respectfully traverse this rejection for at least the reason that *Microsoft* further in view of *Brownell* and *Moroz* fails to disclose, teach, or suggest all of the elements of claims 42 – 45, 53 – 56, and 64 – 67. More specifically, dependent claims 42 – 45 are believed to be allowable for at least the reason that these claims depend from allowable independent claim 41. Dependent claims 53 – 56 are believed to be allowable for at least the reason that they depend from allowable independent claim 52. Dependent claims 64 – 67 are believed to be allowable for at least the reason that they depend

from allowable independent claim 63. *In re Fine, Minnesota Mining and Mfg. Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

**II. Rejections Under 35 U.S.C. §103(a) – Microsoft and Brownell**

**A. Claim 46 is Allowable Over Microsoft further in view of Brownell**

The Office Action indicates that claim 46 stands rejected under 35 U.S.C. §103(a) as being unpatentable over “USB Remote NDIS Devices and Windows” (“Microsoft”) further in view of “USB Host to Host Links” (“Brownell”). Applicants respectfully traverse this rejection for at least the reason that *Microsoft* further in view of *Brownell* fails to disclose, teach, or suggest all of the elements of claim 46. More specifically, claim 46 recites:

A method, at a host, for coupling universal serial bus devices network adapter supporting both remote network drive interface specification and non-network drive interface specification, comprising the steps of:  
detecting a network device, the network device operating on a first configuration;  
issuing a universal serial bus reset to the network device;  
sending the reset to the network device for resetting the state of the network device;  
issuing a command enabling the network device to communicate on the universal serial bus according to a second configuration;  
issuing a first descriptor request enabling a retrieval of device descriptors from the network device;  
returning a device descriptor indicating a function of the network device; and  
issuing configuration commands, whereby, the network device is configured to return a list of descriptors, *wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued.*

*(Emphasis added).*

Applicants respectfully submit that claim 46 is allowable over the cited art for at least the reason that none of the cited references, taken alone or in combination, discloses, teaches, or suggests a “method, at a host, for coupling universal serial bus devices network adapter supporting both remote network drive interface specification and non-network drive interface

specification, comprising the steps of... issuing configuration commands, whereby, the network device is configured to return a list of descriptors, *wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued*" as recited in claim 46. More specifically, *Microsoft* discloses a "REMOTE\_NDIS\_QUERY\_MSG" and a "REMOTE\_NDIS\_QUERY\_CMPLT" (page 2). However, *Microsoft* fails to suggest "issuing configuration commands, whereby, the network device is configured to return a list of descriptors, *wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued*" as recited in claim 46. Additionally, *Brownwell* fails to overcome the deficiencies of *Microsoft*. More specifically, *Brownwell* discloses "handl[ing] CDC Ethernet and many other network 'bulk data' interfaces" (page 6, line 9). However, this is different than "issuing configuration commands, whereby, the network device is configured to return a list of descriptors, *wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued*" as recited in claim 46. For at least this reason, claim 46 is allowable.

**B. Claim 57 is Allowable Over Microsoft further in view of Brownell**

The Office Action indicates that claim 57 stands rejected under 35 U.S.C. §103(a) as being unpatentable over "USB Remote NDIS Devices and Windows" ("Microsoft") further in view of "USB Host to Host Links" ("Brownell"). Applicants respectfully traverse this rejection for at least the reason that *Microsoft* further in view of *Brownell* fails to disclose, teach, or suggest all of the elements of claim 57. More specifically, claim 57 recites:

An apparatus for attaching a universal serial bus network adapter supporting both remote network drive interface specification and non-network drive interface specification, comprising:

a detecting component configured to detect a network device communicating via a first configuration, and for issuing a universal serial bus reset to a network device by a host, and resetting a state of the network device, and for receiving a network device at a universal serial bus port;

a first issuing component configured to issue a command enabling the network device to communicate on the universal serial bus via a second configuration;

a second issuing component configured to issue a first descriptor request for retrieving device descriptors from the network device; and

a third issuing component configured to issue configuration commands, whereby, the network device returns a list of descriptors, *wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued.*

*(Emphasis added).*

Applicants respectfully submit that claim 57 is allowable over the cited art for at least the reason that none of the cited references, taken alone or in combination, discloses, teaches, or suggests an "apparatus for attaching a universal serial bus network adapter supporting both remote network drive interface specification and non-network drive interface specification, comprising... a third issuing component configured to issue configuration commands, whereby, the network device returns a list of descriptors, *wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued*" as recited in claim 57. More specifically, *Microsoft* discloses a "REMOTE\_NDIS\_QUERY\_MSG" and a "REMOTE\_NDIS\_QUERY\_CMPLT" (page 2). However, *Microsoft* fails to suggest "a third issuing component configured to issue configuration commands, whereby, the network device returns a list of descriptors, *wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued*" as recited in claim 57. Additionally, *Brownwell* fails to overcome the deficiencies of *Microsoft*. More specifically, *Brownwell* discloses "handl[ing] CDC Ethernet and many other network 'bulk data' interfaces" (page 6, line

9). However, this is different than "a third issuing component configured to issue configuration commands, whereby, the network device returns a list of descriptors, ***wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued***" as recited in claim 57. For at least this reason, claim 57 is allowable.

**C. Claim 68 is Allowable Over Microsoft further in view of Brownell**

The Office Action indicates that claim 68 stands rejected under 35 U.S.C. §103(a) as being unpatentable over "USB Remote NDIS Devices and Windows" ("Microsoft") further in view of "USB Host to Host Links" ("Brownell"). Applicants respectfully traverse this rejection for at least the reason that *Microsoft* further in view of *Brownell* fails to disclose, teach, or suggest all of the elements of claim 68. More specifically, claim 68 recites:

A system for attaching a universal serial bus network adapter supporting both remote network drive interface specification and non-network drive interface specification, comprising:  
    a universal serial bus port configured to receive a network device according to a first configuration;  
    a detecting component configured to detect the network device coupled to the universal serial bus port;  
    a first issuing component configured to issue a universal serial bus reset to the network device to reset the state of the network device;  
    a second issuing component configured to issue a command to enable the network device to communicate on the universal serial bus according to a second configuration;  
    a third issuing component configured to issue a first descriptor request to retrieve device descriptors from the network device;  
    a receiving component configured to receive a device descriptor listing indicating its function from the network device; and  
    a fourth issuing component configured to issue configuration commands, whereby, the network device returns a list of descriptors, ***wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued***.

*(Emphasis added).*

Applicants respectfully submit that claim 68 is allowable over the cited art for at least the reason that none of the cited references, taken alone or in combination, discloses, teaches, or suggests a "system for attaching a universal serial bus network adapter supporting both remote network drive interface specification and non-network drive interface specification, comprising... a fourth issuing component configured to issue configuration commands, whereby, the network device returns a list of descriptors, ***wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued***" as recited in claim 68. More specifically, *Microsoft* discloses a "REMOTE\_NDIS\_QUERY\_MSG" and a "REMOTE\_NDIS\_QUERY\_CMPLT" (page 2). However, *Microsoft* fails to suggest "a fourth issuing component configured to issue configuration commands, whereby, the network device returns a list of descriptors, ***wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued***" as recited in claim 68. Additionally, *Brownwell* fails to overcome the deficiencies of *Microsoft*. More specifically, *Brownwell* discloses "handl[ing] CDC Ethernet and many other network 'bulk data' interfaces" (page 6, line 9). However, this is different than "a fourth issuing component configured to issue configuration commands, whereby, the network device returns a list of descriptors, ***wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued***" as recited in claim 68. For at least this reason, claim 68 is allowable.

**D. Claim 74 is Allowable Over Microsoft further in view of Brownell**

The Office Action indicates that claim 74 stands rejected under 35 U.S.C. §103(a) as being unpatentable over "USB Remote NDIS Devices and Windows" ("Microsoft") further in view of "USB Host to Host Links" ("Brownell"). Applicants respectfully traverse this rejection for at least the reason that *Microsoft* further in view of *Brownell* fails to disclose, teach, or suggest all of the elements of claim 74. More specifically, claim 74 recites:

A computer-readable media containing a computer-executable program for attaching a universal serial bus network adapter supporting both remote network drive interface specification and non-network drive interface specification, the program comprising:

one or more instructions for issuing a universal serial bus reset to the network device by the host, the network device operating to a first configuration;

one or more instructions for resetting the state of the network device;

one or more instructions for enabling the network device to communicate on the universal serial bus according to a second configuration;

one or more instructions for issuing by the host a first descriptor request enabling to retrieve device descriptors from the network device;

one or more instructions for returning by the network device a computer code device descriptor indicating its function; and

one or more instructions for issuing by the host configuration commands, whereby, the network device returns a list of descriptors, *wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued.*

*(Emphasis added).*

Applicants respectfully submit that claim 74 is allowable over the cited art for at least the reason that none of the cited references, taken alone or in combination, discloses, teaches, or suggests a "computer-readable media containing a computer-executable program for attaching a universal serial bus network adapter supporting both remote network drive interface specification and non-network drive interface specification, the program comprising... one or more instructions for issuing by the host configuration commands, whereby, the network device

returns a list of descriptors, ***wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued*** as recited in claim 74. More specifically, *Microsoft* discloses a "REMOTE\_NDIS\_QUERY\_MSG" and a "REMOTE\_NDIS\_QUERY\_CMPLT" (page 2). However, *Microsoft* fails to suggest "one or more instructions for issuing by the host configuration commands, whereby, the network device returns a list of descriptors, ***wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued***" as recited in claim 74. Additionally, *Brownwell* fails to overcome the deficiencies of *Microsoft*. More specifically, *Brownwell* discloses "handl[ing] CDC Ethernet and many other network 'bulk data' interfaces" (page 6, line 9). However, this is different than "one or more instructions for issuing by the host configuration commands, whereby, the network device returns a list of descriptors, ***wherein in response to a determination that that at least one of the descriptors indicates multiple supported configurations, a second descriptor request is issued***" as recited in claim 74.

For at least this reason, claim 74 is allowable.

E. **Claims 47 – 51, 58 – 62, 69 – 73, and 75 – 78 are Allowable Over Microsoft further in view of Brownell**

The Office Action indicates that claims 47 – 51, 58 – 62, 69 – 73, and 75 – 78 stand rejected under 35 U.S.C. §103(a) as being unpatentable over "USB Remote NDIS Devices and Windows" ("Microsoft") further in view of "USB Host to Host Links" ("Brownell"). Applicants respectfully traverse this rejection for at least the reason that *Microsoft* further in view of *Brownell* fails to disclose, teach, or suggest all of the elements of claims 47 – 51, 58 – 62, 69 – 73, and 75 – 78. More specifically, dependent claims 47 – 51 are believed to be allowable for at least the reason that these claims depend from allowable independent claim 46. Dependent claims 58 – 62 are believed to be allowable for at least the reason that they depend from allowable independent claim 57. Dependent claims 69 – 73 are believed to be allowable for at least the reason that they depend from allowable independent claim 68. Dependent claims 75 – 78 are believed to be allowable for at least the reason that these claims depend from allowable independent claim 74. *In re Fine, Minnesota Mining and Mfg. Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

**CONCLUSION**

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested.

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and Official Notice, or statements interpreted similarly, should not be considered well-known for the particular and specific reasons that the claimed combinations are too complex to support such conclusions and because the Office Action does not include specific findings predicated on sound technical and scientific reasoning to support such conclusions.

If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

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